

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT of Maryland  
Greenbelt**

**IN RE**

**Tamara R. Owens**

Case No. **20-11765**  
Chapter 13

**Debtor**

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**OBJECTION TO CONFIRMATION OF CHAPTER 13 PLAN**

COMES NOW, CSMC 2019-JR1 Trust, by Counsel, and for its Objection to Confirmation of the Chapter 13 Plan filed by the debtor states as follows:

1. The bank is a secured creditor of the debtor pursuant to a Deed of Trust dated March 5, 2007 which secures a Mortgage Note to real property of the Debtors located at 6125 Silver Leaf Lane, Forestville, MD 20747.
2. As of the date of filing, the lender was owed approximately \$42,257.61 of which approximately \$8,101.45 are the pre-petition arrears.
3. The Debtor's Plan proposes to pay a total of \$0.00 for the pre-petition arrears.
4. Creditor objects as the plan fails to treat or list creditor's claim.
5. The Plan does not comply with 11 U.S.C. Section 1325, in that it does not pay the Movant, its pre-petition arrearage claim.

WHEREFORE, the Movant respectfully requests that Confirmation of the Chapter 13 Plan submitted by the Debtors herein be denied, and for any other relief the Court deems necessary.

Respectfully Submitted,

MARK MEYER  
MD BAR 15070  
ROSENBERG & ASSOCIATES, LLC  
4340 East West Highway  
SUITE 600  
BETHESDA, MARYLAND 20814  
301-907-8000

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/s/ Mark D. Meyer, Esq.

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FOR THE DISTRICT OF MARYLAND  
Located in Greenbelt

IN RE

TAMARA R OWENS

Debtor

Case No. 20-11765-TJC  
Chapter 13

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**CERTIFICATE OF SERVICE**

I hereby certify that on the 13th day of February, 2020, I reviewed the Court's CM/ECF system and it reports that an electronic copy of the Objection to Plan will be served electronically by the Court's CM/ECF system on the following:

Rowena Nicole Nelson, Esquire

Rebecca A Herr, Trustee

I hereby further certify that on the 13th day of February, 2020, a copy of the Objection to Plan was also mailed first class mail, postage prepaid to:

Tamara R Owens  
7134 Britens Way  
Brandywine, MD 20613

Respectfully Submitted,

/s/ Mark D. Meyer, Esq.  
Mark D. Meyer, Esq.  
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MARK MEYER  
DC BAR 475552  
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VA BAR 74290

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